

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MRI Software, LLC,)	Case No. 1:12-cv-01082
)	
Plaintiff,)	Judge Christopher A. Boyko
)	
vs.)	
)	
Lynx Systems, Inc. et al.,)	
)	
Defendants.)	

Unopposed Motion to Extend Case Deadlines

Defendants Lynx Systems, Inc. and Donald Robinson hereby move the Court to extend the deadlines set forth in the Court's November 13, 2014 Order, stating, *inter alia*, as follows:

Non-Expert Discovery due by 2/27/2015. Expert Reports due by 4/1/2015 and 5/1/2015; Reply Expert Reports by 5/15/2015. Expert Discovery due by 6/15/2015. Dispositive Motions due by 7/15/2015.

Having conferred with counsel for MRI Software, LLC, the undersigned counsel for Lynx and Mr. Robinson represent that this motion is unopposed.

Over the past several months, the parties engaged in good faith, but ultimately unsuccessful, settlement negotiations. The parties also have worked together to resolve a number of outstanding discovery matters, including an addendum to the Stipulated Protective Order regarding the production of source code, which the parties have filed with the Court as Docket # 156. The parties have propounded new discovery requests, including discovery requests served by and upon Donald Robison who was added as a defendant in the case. To allow the parties to complete fact discovery in this case, Lynx

and Mr. Robinson request, without opposition by MRI, that the Court extend the fact discovery cut-off from February 27, 2015, until May 29, 2015, with corresponding extensions to the remaining case deadlines, and enter an order setting the following schedule for completion of fact and expert discovery and dispositive motion practice:

Substantial completion of each party's document production:	April 1, 2015
Fact Discovery Cut-Off:	May 29, 2015
Expert report by party with burden of proof:	July 1, 2015
Response expert reports:	July 31, 2015
Reply expert reports :	August 14, 2015
Expert Discovery complete:	September 18, 2015
Dispositive motion deadline:	October 16, 2015

This unopposed motion is not brought or meant for purposes of delay, but to allow the parties time to complete fact discovery in this case.

Respectfully submitted,

Dated: February 27, 2015

/s/ David T. Movius
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Certificate of Service

I hereby certify that, on February 27, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

/s/ David T. Movius
Attorney for Lynx Systems, Inc.